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December 13, 2011

File No. 08385.2

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Mr. Keith Olinger Enforcement Office (SDF-7-5) U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA 9410

Re:

Response to Information Request Related to

Stringfellow Superfund Site

Dear Mr. Olinger:

This will confirm our telephone conversation of earlier this month regarding the Section 104(e) request for information directed to Stringfellow Quarry Co, Inc. dated November 3, 2011. During our call I explained, among other things:

- (1) Ruthella Dole holds the title of President of Stringfellow Quarry Co., Inc. for the sole reason she is the only person alive who had any connection with the referenced corporation and the Stringfellow hazardous waste site in Riverside County, California. With that being said, Mrs. Dole has no personal knowledge regarding anything having to do with the waste site and/or any company related to the operation of the Stringfellow site. Her deceased former husband, Earl Nutt, had an ownership interest in the company. He and aii members of the Stringfellow family who had any personal involvement with the site and/or Stringfellow Quarry Co., Inc. are long since deceased.
- (2) All records and documents having anything to do with the waste site were produced to the EPA and the State of California decades ago. The original of the records were later destroyed consistent with the document destruction policy of Lewis Brisbois Bisgaard & Smith LLP, counsel for the Stringfellow parties. This destruction occurred years after the Federal Superfund action had been closed.
- (3) The Federal Superfund lawsuit was fully litigated and ultimately the U.S. Federal District Court for the Central District of California ruled in favor of the Stringfellow parties and assigned them a zero percentage of liability under CERCLA for all cost related

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to the clean up and abatement of the Stringfellow site. That litigation spanned literally twenty years and wrapped up as far as the Stringfellow parties were concerned in the mid-1990's.

- (4) There is no one alive with personal knowledge regarding any of the matters set forth in the subject Section 104(e) information request.
- (5) Stringfellow Quarry Co., Inc. is a defunct corporation and has done no business since shortly after the Stringfellow site was closed in late 1972. All corporate records, including the Articles of Incorporation, all Minutes and corporate records, have been destroyed.

In addition to the above, please be advised that massive amounts of discovery were conducted by the United States and the State of California over the course of many years of the Superfund litigation. I respectfully suggest that most, if not all of the information sought by the Section 104(e) request for information has been previously provided to the United States and the State of California.

With respect to the issue of rocket fuel and explosive testing in the area of the former Stringfellow hazardous waste site, it is my best recollection there were no leases by and between any Stringfellow entity and any third party for the conducting of any such tests. My best recollection is that the records regarding any such testing were a part of the record during the time period the Superfund action was being litigated and that the testing in question did not take place on property owned by Stringfellow Quarry Co., Inc. or any other Stringfellow related entity.

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cc: Ruthella Dole

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